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U.S. DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

★ SEPT 14 2005 ★

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PAUL R. NALVEN*
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*MEMBER OF NEW YORK
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September 8, 2005

Hon. John Gleeson
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

granted
So ordered

Re: United States v. Jenny Tobon, 03 Cr. 349 (JG)

s/John Gleeson

Dear Judge Gleeson:

in 305

9-8-05

I write on behalf of our client, Jenny Tobon, who is at liberty awaiting sentencing in this matter. As a condition of her bail, Ms. Tobon has surrendered her passport to the authorities. We ask permission that she be permitted to have her passport for a 48-hour period so that she may use it to apply for a New York State non-driver's identification card (as she has no government issued photographic identification in her possession). We previously sought and the Court previously granted a similar application to this one but at that time Ms. Tobon was unable to obtain her identification.

In that vein, the defense has previously sought and received the government's permission for this same application but we were unable to reach the prosecutor as we believe he is not in his office for several days.

As always, thank you for considering this request.

Respectfully submitted,

Paul Nalven

Paul R. Nalven

cc: A.U.S.A. Lee Freedman